



U.S. Department of Justice

United States Attorney
District of New Jersey

970 Broad Street, Suite 700
Newark, NJ 07102

973/645-2700

EL/PL AGR
2009R00553

January 14, 2010

Andrew J. Proto
Rieblin, Proto, Schmidt & Sachs, LLP
One North Broadway, Suite 401
White Plains, New York 10601

Re: Plea Agreement with Madeline Wright10-320 SRC
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Dear Mr. Proto:

This letter sets forth the plea agreement between your client, Madeline Wright, and the United States Attorney for the District of New Jersey ("this Office").

Charge

Conditioned on the understandings specified below, this Office will accept a guilty plea from Madeline Wright to a one count information, which charges wire fraud, in violation of 18 U.S.C. §§ 1343 and 2. If Madeline Wright enters a guilty plea and is sentenced on this charge, and otherwise fully complies with all of the terms of this agreement, this Office will not initiate any further criminal charges against Madeline Wright for, between in or about 2004 through in or about April 2009, diverting funds and wiring money from Cartus accounts to bank accounts controlled by Madeline Wright. However, in the event that a guilty plea in this matter is not entered for any reason or the judgment of conviction entered as a result of this guilty plea does not remain in full force and effect, defendant agrees that any dismissed charges and any other charges that are not time-barred by the applicable statute of limitations on the date this agreement is signed by Madeline Wright may be commenced against her, notwithstanding the expiration of the limitations period after Madeline Wright signs the agreement.

Sentencing

The violation of 18 U.S.C. §§ 1343 and 2 to which Madeline Wright agrees to plead guilty carries a statutory maximum prison sentence of 20 years and a statutory maximum fine

equal to the greatest of: (1) \$250,000; (2) twice the gross amount of any pecuniary gain that any persons derived from the offense; or (3) twice the gross amount of any pecuniary loss sustained by any victims of the offense. Fines imposed by the sentencing judge may be subject to the payment of interest.

The sentence to be imposed upon Madeline Wright is within the sole discretion of the sentencing judge, subject to the provisions of the Sentencing Reform Act, 18 U.S.C. § 3551-3742, and the sentencing judge's consideration of the United States Sentencing Guidelines. The United States Sentencing Guidelines are advisory, not mandatory. The sentencing judge may impose any reasonable sentence up to and including the statutory maximum term of imprisonment and the maximum statutory fine. This Office cannot and does not make any representation or promise as to what guideline range may be found by the sentencing judge, or as to what sentence Madeline Wright ultimately will receive.

Further, in addition to imposing any other penalty on Madeline Wright, the sentencing judge: (1) will order Madeline Wright to pay an assessment of \$100 pursuant to 18 U.S.C. § 3013, which assessment must be paid by the date of sentencing; (2) must order Madeline Wright to pay restitution pursuant to 18 U.S.C. §§ 3663 et seq.; (3) may order Madeline Wright, pursuant to 18 U.S.C. § 3555, to give notice to any victims of her offense; and (4) pursuant to 18 U.S.C. § 3583, may require Madeline Wright to serve a term of supervised release of not more than 3 years, which will begin at the expiration of any term of imprisonment imposed. Should Madeline Wright be placed on a term of supervised release and subsequently violate any of the conditions of supervised release before the expiration of its term, Madeline Wright may be sentenced to not more than 2 years' imprisonment in addition to any prison term previously imposed, regardless of the statutory maximum term of imprisonment set forth above and without credit for time previously served on post-release supervision, and may be sentenced to an additional term of supervised release.

Rights of this Office Regarding Sentencing

Except as otherwise provided in this agreement, this Office reserves its right to take any position with respect to the appropriate sentence to be imposed on Madeline Wright by the sentencing judge, to correct any misstatements relating to the sentencing proceedings, and to provide the sentencing judge and the United States Probation Office all law and information relevant to sentencing, favorable or otherwise. In addition,

this Office may inform the sentencing judge and the United States Probation Office of: (1) this agreement; and (2) the full nature and extent of Madeline Wright's activities and relevant conduct with respect to this case.

Rights of This Office Regarding Post-Sentencing Proceedings

This Office specifically reserves the right to file, oppose, or take any position in any appeal, collateral attack, or proceeding involving post-sentencing motions or writs.

Other Provisions

This agreement is limited to the United States Attorney's Office for the District of New Jersey and cannot bind other federal, state, or local authorities. However, this Office will bring this agreement to the attention of other prosecuting offices, if requested to do so.

This agreement was reached without regard to any civil or administrative matters that may be pending or commenced in the future against Madeline Wright. This agreement does not prohibit the United States, any agency thereof (including the Internal Revenue Service), or any third party from initiating or prosecuting any civil proceeding against Madeline Wright.

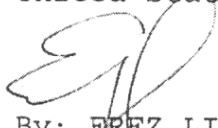
Prior to the date of sentencing, Madeline Wright shall: (1) file accurate amended personal returns for calendar years 2005 through 2009; (2) provide all appropriate documentation to the Internal Revenue Service in support of such returns, upon request; (3) pay to the Internal Revenue Service all taxes and any penalties owed on those returns or, if unable to do so, make satisfactory repayment arrangements with the Internal Revenue Service; and (4) fully cooperate with the Internal Revenue Service and comply with the tax laws of the United States. Further, Madeline Wright agrees to allow the contents of her IRS criminal file to be given to civil attorneys and support staff of the Internal Revenue Service to enable them to investigate any and all civil penalties that may be due and owing by Madeline Wright. With respect to disclosure of the criminal file to the Internal Revenue Service, Madeline Wright waives any rights under Title 26, United States Code, Section 7213 and Fed. R. Crim. P. 6(e), and any other right of privacy with respect to Madeline Wright's tax returns and return information.

No Other Promises

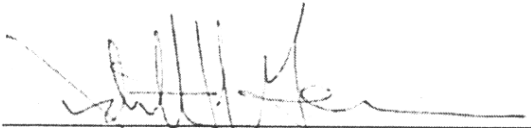
This agreement constitutes the plea agreement between Madeline Wright and this Office and supersedes any previous agreements between them. No additional promises, agreements, or conditions have been made or will be made unless set forth in writing and signed by the parties.

Very truly yours,

PAUL J. FISHMAN
United States Attorney

By:  EREZ LIEBERMANN
Assistant U.S. Attorney

APPROVED:


JUDITH GERMANO
Chief, Commercial Crimes Unit
Criminal Division

I have received this letter from my attorney, Andrew Proto, Esq., I have read it, and I understand it fully. I hereby accept the terms and conditions set forth in this letter and acknowledge that it constitutes the plea agreement between the parties. I understand that no additional promises, agreements, or conditions have been made or will be made unless set forth in writing and signed by the parties.

AGREED AND ACCEPTED:



Madeline Wright

Date: 5/10/2010



Andrew Proto, Esq.

Date: 5/10/2010